

THE LAW OFFICES OF SEAN M. MAHER, PLLC

June 29, 2020

VIA ECF

Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**RE: *United States v. Michael Little*, 12 Cr. 647 (PKC)
Letter motion of Michael J. Little, *Pro Se*, seeking return of passport
and permission to return to and serve supervised release in
the United Kingdom**

Dear Judge Castel:

Mr. Michael J. Little, who I have assisted as standby counsel, has requested that I file the attached letter motion and exhibit on his behalf.

Respectfully submitted,

_____/S/
Sean M. Maher

Attachment: Letter motion of Michael J. Little w/ Exhibit A

CC: All counsel via ECF;
PO Kannellopoulos and PO Moscato via email

**MICHAEL J. LITTLE
8-03 43RD AVENUE
LONG ISLAND CITY
NEW YORK 11101
+1 646 660 1085**

June 29th 2020

By ECF & EMAIL

The Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: **Application for return of passport and permission to return to and serve supervised release in the United Kingdom**
United States of America v. Michael Little
Docket No. 12-cr-0647 (PKC)

Dear Judge Castel,

I write from Moshannon Valley Correctional Center [MVCC], Philipsburg, PA 16866. I will be released to the above address on July 14, 2020 after a quarantine period commencing today. Because of the Queens address, my supervised release will be monitored by the Department of Probation in the EDNY who have liaised with MVCC in the preparation of my release plan. My designated probation officer is John Kanellopoulos.

I am applying to the Court for an order (i) for the return of my passport; and (ii) for permission permanently to return to my home in the U.K. and undertake my supervised release obligations there. At my sentencing hearing on November 20th 2018, the Court indicated I would be permitted to serve my one-year term of supervised release in the United Kingdom. *See* November 20, 2018 Transcript at pp. 75-76.

My understanding is I cannot be deported while my appeal remains pending. My reply brief is due August 3, 2020. The Second Circuit docket indicates that oral argument is proposed for the week of September 14. *See US v. Little*, 18-3622.

My daughter Anneliese, arranged her wedding day for August 21, 2020 [See Exhibit A, attached] in the expectation her father would be home by then to give her away. A kind friend has underwritten to provide an airline ticket for me from New York to London. By making my own way home, the US Treasury would save the costs of deportation.

EDNY Probation Service, through PO Kanellopoulos, has indicated it takes no position on this application and defers to the decision of the Court in respect of the release of my passport and my return to the U.K. The Government, through AUSA DiMase has also indicated it takes no position on my application to return to the UK.

My prayer is the Court will grant permission for the return of my passport and allowing me to return home at least 14 days before August 21, 2020 [to satisfy UK quarantine requirements] so I can be there for my daughter's wedding.

Respectfully submitted

/s/ M. J. Little
Michael J. Little, *Pro Se*

cc: AUSA Christopher J, DiMase. via ECF
Sean Maher, Esq. via ECF
Robert A, Culp, Esq. via email
PTO John Moscato via email
US Probation Officer John Kanellopoulos via email